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Attorneys for Defendant Enby, LLC

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON

BOYAJIAN PRODUCTS, LLC,  
  
Plaintiff,

v.

ENBY LLC,

Defendant.

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No. 3:20-cv-01991-HZ

DEFENDANT'S MOTION FOR EXTENSION  
OF TIME TO RESPOND TO COMPLAINT

**LR 7-1(a) CERTIFICATE**

Counsel for defendant Enby, LLC ("defendant") conferred with plaintiff Boyajian Products, LLC's ("plaintiff") counsel by telephone and email regarding this request for an extension of time. Plaintiff does not oppose defendant's request.

## MOTION

In accordance with Federal Rule of Civil Procedure 6(b), defendant respectfully moves the court for an extension of time to respond to plaintiff's complaint up to and including January 8, 2021. Defendant accepted service of the complaint on November 17, 2020. The parties have conferred, and agreed to a response date of January 8, 2021. Before defendant's original deadline to respond to the complaint, counsel for defendant notified the court's courtroom deputy about this request for extension.

Good cause exists for this extension as local counsel has only recently been retained in this matter, and requires time to consider and prepare defendant's initial response to the complaint. Defendant reserves the right to assert all potential defenses and objections to the complaint. This motion is unopposed and not made for purposes of delay.

DATED: December 23, 2020

MILLER NASH GRAHAM & DUNN LLP

s/ John C. Clarke

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*Attorneys for Defendant Enby LLC*

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Defendant's Motion for Extension of Time to Respond to Complaint on the attorney or party listed below on the date set forth below by the method(s) indicated:

Sandra S. Gustitus, OSB No. 143298  
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Attorneys for Plaintiff Boyajian Products,  
LLC

- ☐ First-class mail, postage prepaid
- ☐ Facsimile, pursuant to ORCP 9 F
- ☐ Hand-delivery
- ☐ Overnight courier, delivery prepaid
- ☐ E-mail, pursuant to ORCP 9 G
- ☒ E-mail copy, as a courtesy only
- ☒ OJD EFILING SYSTEM, if registered at the party's email address as recorded on the date of service in the eFiling system, pursuant to UTCR 21.100.
- ☐ Other

DATED: December 23, 2020.

MILLER NASH GRAHAM & DUNN LLP

s/ John C. Clarke

Sean D. O'Brien, OSB No. 141703  
John C. Clarke, OSB No. 153245

*Of Attorneys for Defendant*